DEPT. OF TRANSPORTATION DOCKET SECTION

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June 16, 1998

Post Office Box 17011 Fort Smith, Arkansas 72917-7011

Docket No. FHWA 98-3706 - 444
Docket Clerk
U.S. DOT Dockets
Room PL-40 1
400 Seventh Street, S.W.
Washington, DC 20590-00 1

Trans-States Lines, Inc., as a member of the Truckload Carriers Association and as a concerned participant in the review of the FHWA proposed rulemaking on Hours of Service of Driver; Supporting; Documents, agrees *in toto* with the response to this proposal presented by the Truckload Carriers Association.

We firmly recommend that any changes to the definition of supporting documents and their use in compliance audits be held in abeyance until the completion of the anticipated review of the Hours of Service rulemaking has been completed.

We also believe that when the time comes to establish criteria for supporting documents, that the FHWA should establish criteria which are mutually understood and reliably implemented by all parties involved in the process, including drivers and independent contractors.

We share with the FHWA a common goal to operate our equipment in a safe manner which protects the conduct of commerce and the general public on our roadways. We do not believe this proposed rulemaking contributes to that goal in any substantive way.

Sincerely,

Larry Atchlev

Vice President, Risk Management

and Human Resources